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ABSTRACT

In compliance with the 1990 Americans with Disabilities Act (ADA) and as part of an effort to evaluate staff development and disability education efforts, the colleges in California's San Diego Community College District undertook focus group evaluations of key campus constituents in fall 1997. At the district's San Diego City College, focus groups were held with students, disabled and not, administrators, faculty, and staff. Surveys were sent to potential participants prior to focus group dates to help stimulate discussion, which centered on perception of program access, program eligibility, classroom practices and curricula, access to computers and information technology, and employment accommodations, where appropriate. While in general participants felt that ADA provisions had been or will be accomplished, there were complaints about limited access to campus computer laboratories and walkways and ramps in need of repair. There was general consensus that a campus review should be conducted, and training was advocated to improve accommodation and access. (BCY)

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ED 413 972

SAN DIEGO COMMUNITY COLLEGE DISTRICT

AMERICANS WITH DISABILITIES ACT

(ADA)

SELF-EVALUATION STUDY

(CITY COLLEGE FINDINGS)

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San Diego Community College District

Americans with Disabilities Act

City College Self-Evaluation Study

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Americans with Disabilities Act
City College Self-Evaluation Study

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San Diego Community College District

Americans with Disabilities Act

City College Self-Evaluation Study

Background

The Americans with Disabilities Act (ADA) of 1990 is a comprehensive civil rights law that prohibits discrimination against qualified individuals with disabilities in the areas of employment, public accommodations, state and local government services, transportation and telecommunications. Title II, Subtitle A, became effective on January 26, 1992, and all programs, activities, and services of public institutions are subject to its provisions. Under Title II, a public agency or institution must make its programs, activities, and services accessible and useable for individuals with disabilities. The only exception to these fundamental provisions of usability and accessibility would be if complying with these mandates *...would result in a fundamental alteration in the nature of its programs, activities, or services, or would result in undue financial and administrative burdens.*

As a public educational institution, the San Diego Community College District (SDCCD) is subject to the provisions of the ADA and has taken steps to ensure its implementation. The SDCCD has sponsored workshops for SDCCD staff to learn about the background, goals, and provisions of the ADA and its implications for the SDCCD. In addition to District coordination through the provision of information workshops, the individual colleges and Continuing Education Centers have also appointed local Site Compliance Officers (SCO's). These officers are responsible for providing support for affirmative action compliance at the colleges and Continuing Education Centers and are liaisons for individuals with complaints about SDCCD. They are also available to help interpret and ensure compliance with the provisions of the ADA at the campus and center level.

Purpose

The regulations governing the implementation of the ADA are comprehensive with respect to how affected entities are to ensure access, both architectural and programmatic, for individuals with disabilities. Beyond identifying and remediating architectural barriers, the ADA has other provisions that may be more complex and difficult to measure. For example, the anti-discrimination provisions of the Act are comprehensive and far-reaching. Barriers to full participation in programs and services are viewed in much the same way as are architectural barriers to access. As with architectural barriers, public institutions and agencies are to identify and remove all non-essential barriers or impediments to ensure full participation in programs and services. Section 35.105 of the US Department of Justice's regulation implementing Title II requires all affected institutions to conduct an appraisal or self-evaluation of local compliance with the anti-discrimination features of the Act. For example one of the intended outcomes of this legislation and the implementing regulations was to raise awareness and expand opportunities for equal participation for individuals with disabilities. Affected entities were also instructed to take steps to ensure that awareness is demonstrated by staff who potentially work with individuals with disabilities. This need to both inform and evaluate the awareness of ADA compliance has led to the focus group interview approach taken here in the SDCCD. The activity of those participating in the focus group discussion coupled with the pre-focus group survey and the discussion during the group meeting enables participants to evaluate the level of their own awareness and learn from others. This approach also allows staff to determine the effectiveness of their efforts to improve awareness and knowledge of relevant law and approaches to assisting those with disabilities to access programs and services. In meetings held between the Assistant Chancellor for Student Services, the Manager of Disabled Students Programs and Services (DSPS), and the Research Director, the focus group approach emerged as the most effective means to both educate college and District staff as well as evaluate the level of ADA awareness levels.

Section 35.105 of the U.S. Department of Justice's regulations implementing Title II requires all public entities to conduct a self-evaluation to be completed by January 26, 1992. However, the law also states that public entities are liable for any discriminatory policies or practices in effect after January 26, 1992. As a result, ***any discriminatory practices or policies identified by the self-evaluation process should be modified immediately***. Until this work was undertaken to identify potential program and non-

architectural barriers to full participation in SDCCD programs and services, little systematic effort had been expended to gather this information other than through the complaint process. This effort should be viewed as both complying with federal law, and as preventative work to identify practices or policies that fail to provide equitable access for individuals with disabilities. Prior to this work, there has not been any systematic effort to evaluate the effectiveness of the SDCCD ADA awareness efforts. This report, while not exhaustive, is therefore a significant first step in both compliance and in evaluating our efforts at education and staff development.

The ADA defines a person as having a disability when they:

1. Have a physical or mental impairment that substantially limits one or more major life activities,

2. Have a record of a physical or mental impairment that substantially limits one or more of the individual's major life activities, or mental impairment that substantially limits one or more of the individual's major life activities, or,

3. Are regarded as having such an impairment, whether they have the impairment or not.

The term disability thus covers a wide range of conditions and may include mobility, vision, hearing or speech impairments, learning disabilities, chronic health conditions, emotional illnesses, HIV disease (whether symptomatic or asymptomatic), and a history of drug addiction.

Through this self-evaluation, the SDCCD colleges and centers must:

1. Evaluate current services, policies and practices, and identify those that do not meet Title II requirements, and

2. Specify what modifications will be made to identified services, policies or practices that deny or limit participation of individuals with disabilities in their educational programs or activities. Areas that need careful examination include, but are not limited to: general policies and practices, communications, auxiliary aids, eligibility and admission requirements, evacuation from buildings, employment, building and construction policies, and architectural barriers.

Physical Access

Accessibility for individuals with disabilities is often viewed solely as architectural access. The ADA, however goes beyond this concept to require that all services, programs, and activities are accessible. An extensive review of architectural barriers to program accessibility in the SDCCD was completed February 1, 1993. This ADA Transition Plan can be found in the campus Business or Facilities Office, as well as in the District Facilities Office. The intent of this review was to identify the major physical barriers to program access. In Section I of this Self-Evaluation ADA Compliance Survey, participants were asked to identify other smaller physical impediments to access.

Prior to the focus group meeting, individuals selected for participation were sent a survey that covered the intended discussion of the focus group. This was done to provide a review or for some respondents, a first look at the terms, issues, and guidelines of the ADA as it applies to educational institutions. It is the function of this survey to cover the programmatic aspects of accessibility. For the sake of brevity, the term "program" will be used in this report as inclusive of the phrase, "programs, activities, and services."

Nine groups were identified at City College to complete the self-evaluation surveys prior to their participation in the focus groups. However, due to the lack of representation of the Special Admit group only eight groups will be discussed in this report. The College President selected the individuals to participate in the focus groups. Participants were asked to first complete the self-evaluation surveys and bring their responses to the focus group meeting. Participants were given the opportunity to change, add, or delete any responses during the focus group discussions. The surveys were thus intended and designed to make the focus group discussion more directed and informative.

Respondents were chosen according to their membership or affiliation in a particular group. They were chosen to participate in one of nine focus groups. Groups were formed comprised of:

1. Students
2. Students with Disabilities
3. Academic and Student Services Managers
4. Classified Staff
5. Student Services Department Heads
6. Disabled Services Program and Services Staff
7. Faculty (including counselors and librarians)
8. College Business Office and Facilities Staff

City College Self-Evaluation Study Findings

Student Interview: Student With and Without Disabilities Focus Groups

In the fall 1997 term, several students with and without disabilities were asked to participate in independent focus groups at City College. Only four students with disabilities and one student without a disability participated in the focus group and completed the questionnaire. Because of the small number of participants, the responses for the two student focus groups were combined to strengthen the reliability of the findings. The following discussion briefly summarizes the findings of the focus group interviews and student questionnaires, and combines the information received from both students with and without disabilities.

Access to Programs

The respondents, both students with and without disabilities, did appear to be aware of other students with disabilities who identified themselves to a particular program respondents had participated in. However, the respondents were less aware of faculty and staff members who had identified themselves as individuals with disabilities. Only two students with disabilities indicated that they knew of faculty and staff members who had not identified themselves as individuals with disabilities.

The respondents identified several modifications made to policies or programs for individuals with disabilities since January 26, 1992 (the date noted in the legislation and regulations as a point of reference for program changes or modifications). The following modifications were identified: learning disability programs and courses, test proctoring, disabled student tutoring, additional learning materials, curb cuts, resources for large print readers, and devices to adapt computers for use by students who are blind or have visual impairments.

Students indicated knowledge of auxiliary aides or accommodations provided for individuals with disabilities by City College programs. In the instructional and support services area, the respondents cited the availability of individuals to assist as tutors, sign language interpreters, note takers, readers, and test proctors. The availability of instructional materials were also listed: tape recorders (with instructor approval), assistive listening devices, a tty phone center, NCR paper for note takers, large print and Braille resources, a computer for the students

with visual impairments, taped texts, and magnifiers.

Overall, the students expressed satisfaction with current policies and programs that improved accessibility to individuals with disabilities.

Generally, students indicated that emergency telephone services were provided by the program, but were less aware of the availability of direct tty (teletypewriter) and modem access to emergency services to individuals with disabilities. With regard to telephones on campus, two students with disabilities recommended that telephones with large buttons should be installed. In addition, one DSPS student suggested that City College install tty phones throughout the campus and designate these telephones for users with hearing disabilities. One non-DSPS student suggested that the location of the tty phones be published in the student bulletins and correspondences. The students gave no further recommendations.

There were also mixed responses about the architectural accessibility of all programs at City College whether on- or off-campus. Four students stated they did not know or stated that not all programs were architecturally accessible. Several students noted that doorways and sidewalks needed upgrading and repairs to comfortably accommodate individuals with disabilities. Students also observed the need for more ramps for access onto and throughout the campus. In addition, one student indicated that lower ramps should be constructed for persons who use canes or crutches.

The majority of the students stated that campus events were programmatically accessible through the provision of interpreters, captioned video, assistive listening devices, and large print, ASCII, or Braille formatted handouts or programs. However, three DSPS students did not know that these provisions were available. Several of the interviewees were unaware that they could submit unlawful discrimination complaints based on disability. DSPS students suggested that City College outline, in readily available literature, specific steps to begin the formal complaint process. In addition, they suggested that the complaint process be explained to individuals by faculty or staff. It was also recommended that sensitivity training for all campus faculty and staff should be conducted to prevent unlawful discrimination of individuals with disabilities. Moreover, students were unaware of any planning or advisory boards on which individuals with disabilities serve.

Students were generally unaware and, hence, not able to list some smaller architectural features and non-structural measures (those not apt to be found in the Transition Plan) that limited access to programs. All the

respondents were aware that inquiries about an individual's disability status were collected on a voluntary basis.

Classroom and Curriculum

With the exception of one student, all of the respondents indicated that tape recorders could be used with the instructor's permission. They were less clear as to the availability of Braille note taking devices. There was more agreement that note takers and sign language interpreters were permitted in all classes and at campus meetings. According to the students, guide dogs are allowed on campus and in classrooms, and that additional accommodations are made for students needing modified exams or tests in class. Students were not aware that certain courses could be substituted in the event that students with disabilities could not be accommodated. Students with disabilities indicated that registration was facilitated by priority registration, registration counseling, and the availability of telephone registration at home and on campus. None cited the registration process as limiting access for individuals with disabilities.

Computers and Information Technology

In this area of the interview, respondents were asked about access to information for individuals with disabilities. These questions focused on the availability of adaptive technology to facilitate access to computer hardware and software. These adaptations included print enlargers, speech output systems, document scanners and Braille printers. In this section of the interviews, environmental adaptations refer to physical access to the computing facility and within the facility. Environmental adaptations may include directional signs to indicate a computer lab with adaptive equipment such as wheelchair access with unlocked, accessible doors between the building entrance and the lab, accessible rest rooms, and adaptive equipment in labs that are open a maximum number of hours.

Students were generally not aware of any computing labs or classrooms located in buildings that were not accessible to individuals with disabilities. The majority of the DSPS interviewees indicated that computers for use by individuals with disabilities were found in the same location as computers for non-disabled students, but a few of the interviewees stated that they did not know that these computers were found in the same room as other computers. The computer adaptations for individuals with disabilities that were cited by the students included labels

giving priority use to students with disabilities, detachable keyboards and monitors, accessible disk drives and on-off switches, raised dot indicators on keyboards, Braille labels, interpreters, note takers, closed circuit television, and accessible printers at table height. One student recommended that magnifiers for computer screens be made available.

Administrative Interview: Academic and Student Services Managers, Student Services Department Heads, and College Business Office and Facilities Staff Focus Groups

Eight Academic and Student Services Managers from San Diego City College were asked to participate in a focus group to determine ADA compliance and awareness. Of the eight invitees, five managers participated in the focus group meeting and a sixth manager returned the completed questionnaire. Two Student Services Department Heads attended the focus group and a third returned the completed questionnaire. Of the four College Business Office and Facilities Staff invited to participate, the business manager attended the focus group.

Because of the small number of participants, the responses from the Academic and Student Services Managers, Student Services Department Heads, and College Business Office Staff focus groups were combined to strengthen the reliability of the findings. The following discussion briefly summarizes the findings of the focus group interviews and questionnaires, and combines the information received from the three groups.

Access to Programs

Administrators were generally aware of the number of students with disabilities in their particular program and unaware of any individuals with disabilities who had not identified themselves as a person with a disability. Overall, the respondents were less aware of faculty and staff members with disabilities, who had identified themselves and who had not identified themselves as a person with a disability.

The administrators identified several modifications made to policies or programs for individuals with disabilities since January 26, 1992 (the date noted in the legislation and regulations as a point of reference for program changes or modifications). The Academic and Student Services managers identified the following modifications in detail: interpreters for the hearing impaired, advocates for students with disabilities, follow-up of

students with disabilities, relocation of the DSPS office to the first floor, modifications to elevators, relevant information added to class syllabi, and the purchase of adaptive equipment for DSPS students. In addition, the Student Services department heads identified the following modifications in detail: adaptive computer devices for faculty, change of classroom location to a more accessible site, financial resources for access devices for City College classroom and laboratories. The majority of the administrators did not observe any policies or practices that needed modification in order to include individuals with disabilities in City College programs or activities. One respondent commented that improved accommodations for individuals with psychological disabilities are necessary. Another administrator indicated that modifications were needed to include individuals with disabilities in off-campus field trips.

Administrators indicated that within the Students Services area, DSPS was created for the primary purpose of providing aid and accommodations to individuals with disabilities. Academic and Student Services managers listed several auxiliary aids and accommodations available at City College: testing accommodations, note takers, readers, tape recorders, tty phones, interpreters, visual and auditory aids, and adaptive computer devices.

In addition, the administrators indicated that steps will be taken to ensure that all faculty and staff involved in the instructional programs at City College are informed periodically of ADA requirements. This will be accomplished through dissemination and publication of information regarding ADA requirements and the responsibilities and rights of faculty, staff, and students. This will take place in school meetings and through activities conducted by the college and DSPS office. Access to information is also facilitated by the availability of public notices, consent forms, announcements, newsletters and other communications in accessible formats such as large print, Braille, ASCII diskette and tape recordings.

The administrators indicated that there are tty services for students needing telephone access. The respondents were also generally aware of direct and modem access to emergency services provided by their programs.

Four of the administrators indicated that alternative formats of City College communications were not readily available to students with disabilities. However, five participants affirmed that, upon a student's request, their programs provided communications in alternative formats. No recommendations were suggested to make these formats immediately available to students.

ADA Section II-8.2000 requires a review to ensure that individuals with disabilities are not portrayed in an offensive or demeaning manner. The majority of the respondents indicated that a comprehensive review had been conducted that examined the portrayal of individuals with disabilities in written and audio-visual materials.

The administrators either affirmed that they did not know whether City College programs are architecturally accessible to individuals with disabilities or declared that not all programs were architecturally accessible. Specific examples of architecturally inaccessible sites were the entrance to the Radio and Television booths and the photo lab. One suggestion given was to install an electronic eye over the doors of Admissions and Records, Counseling, and Career Services facilities so that the doors would automatically open.

Administrators stated varying responses when asked whether City College events were programmatically accessible through the provision of sign language interpreters, captioned video, assistive listening devices, and large print, ASCII diskette or Braille formats. However, most of respondents indicated that events are programmatically accessible to persons with disabilities.

Some students with disabilities are unable to carry what is usually considered a full-time course load. Students who attend part-time due to their disability are required to have equal access to financial aid, academic programs, college/center services, and events that are otherwise restricted to full-time students. One respondent indicated that there were certain programs available only to full-time students such as the nursing program. The majority of the respondents did not know of this requirement or are in programs that do not have this requirement.

In regard to the existence and periodic review of specific and clear emergency evacuation procedures for individuals with disabilities, two respondents mentioned that in emergency situations, campus police are called for assistance with a carrier to aid students with disabilities egress from inaccessible floors. Many of the respondents did not describe any detailed procedures suggesting the need for College and District authorities responsible for ADA compliance, in cooperation with other departmental and faculty leaders, to develop detailed evacuation procedures and to publish these plans for all staff and faculty.

One respondent indicated that faculty, staff, students, and the general public were informed that they could file a complaint based on college or District failure to accommodate a disability.

Two of the administrators stated that there were planning or advisory boards on which individuals with disabilities served, and that accommodations have been provided to assist participants with disabilities in serving on

these boards.

Administrators were somewhat aware of smaller architectural features and non-structural measures (those not apt to be found in the Transition Plan) that limited access to programs. One area mentioned for improvement was to clearly mark travel paths from the blue parking area to the elevators by posting visible signs. Three respondents noted the posting of signs at appropriate locations as an effective non-structural measure that could be easily implemented. Another respondent commented that certain walkways were blocked by bicycles locked to lamp posts; it was suggested that the college install bicycle racks to solve this problem. It was also noted that the high counters in the duplicating and reproductions facility limited access for individuals using wheelchairs.

Program Eligibility

All administrators stated that there were no limits to the proportion of individuals with disabilities able to participate or enroll in college programs. With the exception of prerequisite course completion, there was no awareness of any pre-admission evaluation or testing for applicants in addition to District-wide assessment and placement testing. The nationally normed tests used for assessment and placement in the SDCCD have been validated. This validation has been corroborated by visiting audit teams and the state chancellor's office. Accommodations are made for students with disabilities to take placement tests when requested. According to the participants, information about a student's disability status is only collected voluntarily and all such information is kept confidential. It was also noted by participants that their respective offices are accessible to all students and that accommodations are made when needed to enable students with disabilities to come to the office.

Classroom and Curriculum

Only Academic and Student Services managers were asked about classroom and curriculum. All six participants agreed that when necessary, classes are reassigned or relocated to accessible locations to accommodate students with special needs. One respondent was aware of departmental or college time limits for the completion of degree requirements that could not be modified for students with disabilities due to external licensure requirements (one example is the nursing program). When students with disabilities (such as hearing or vision loss or impairment, emotional or mental disabilities, or chronic health conditions) have been excluded from programs, it was due to

health and safety requirements, or state and federal licensing requirements. Others indicated that they did not know or that there were no time limits for the completion of degree requirements.

Academic and Student Services mangers stated that tape recorders could be used in lieu of standard note-taking with the instructor's permission. However, they are less clear whether Braille note taking devices are available to students. Respondents generally agreed that note takers and sign language interpreters, as well as guide dogs, service dogs, and signal dogs, are permitted in all classes or meetings. They also agreed that guide dogs are permitted at all campus locations or meetings. Similarly, all respondents indicated that special testing accommodations were available for students with disabilities. Three of the respondents stated that their respective programs offer internships or job placements that include accommodations for students with disabilities. Two respondents indicated that such opportunities were not offered in their programs. The respondents noted that phone registration has modifications available to students with disabilities. Additionally, tty and support personnel are available at the admissions office to assist students with the registration process.

In general, library and learning resource materials are available to all students with disabilities. Materials in alternative/accessible formats, readers, physical assistance, and sign language interpreters are made available upon request. Computer access to information at the library and the labs are facilitated through adaptive computer technology and adaptive work stations. Additionally, closed circuit television and print enlargers are available. Moreover, the orientation program has been modified to accommodate incoming students with disabilities. Sign language interpreters are provided at various orientation events. Workshops are provided to train faculty on how to better serve students with disabilities. DSPS also offers special orientations for students with disabilities.

Computers and Information Technology

This part of the interview and survey is designed to gather information about computer access for individuals with disabilities. According to the Academic and Student Services managers and department heads, much of the available input technologies are accessible to students with disabilities. These include technological adaptations such as "sticky key" software, trackballs, alternative labels for the keyboard and keypad, and other adaptive technologies. There is also output technology available to individuals with disabilities. These include output devices such as large monitors, screen magnification software, speech synthesizers, magnifying closed circuit

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cameras, Braille printers, and screen flasher. All computing facilities and labs are accessible to individuals with disabilities and all have adaptive technologies. Several documentation formats for individuals with disabilities who need alternatives to reading and handling printed documentation are provided by various programs at City College: Braille, tape recorded, large-print, and diskette (ASCII) documentation, videotapes, and print reading machines. In several of the campus programs, equipment and training is provided for aides who assist students, faculty, and staff with disabilities.

Respondents were asked several questions regarding environmental adaptations concerning physical access to and within the computing facility. The administrators expressed mixed responses as to the accessibility of all computing labs and classroom facilities. Two respondents noted that space limitations created accessibility problems. However, others did indicate that alternative and equivalent facilities were available at accessible locations, such as the DSPS High Tech lab. The majority of the interviewees also noted that the adaptive technology was available during the same times and had the same computing capabilities as the non-adaptive computers. Most agreed that adaptive computers for use by persons with disabilities were located in the same room as the other computers.

Two respondents indicated that within their program several adaptations are available for individuals with disabilities including labels giving priority for use by those with disabilities, keyboards that are detachable and movable, monitors that are detachable and movable, raised dot indicators on the keyboards, accessible power switches and disk drives and printers at table height.

Employment

In this section the responses of the three focus groups were aggregated. However, with respect to the questions in this section, Academic and Student Services managers provided more information and detail than did the Student Services department heads and the Business Office manager. The respondents generally indicated that training and written material has been provided to staff involved in all employment related activities such as recruitment, hiring, interviewing, testing, training and supervising. However, four respondents felt that a training session on the ADA was needed. Most of the interviewees affirmed that departmental staff were familiar with typical forms of reasonable accommodation and notification of such accommodations is given to applicants.

Typical forms of reasonable accommodation include wheelchair access, sign language interpreters, note takes, readers, audio materials, large print, ASCII diskette, or Braille material, and job modification or restructuring. The participants indicated that job descriptions were current and up-to-date and that duty statements identify the essential functions of the job. Overall, they reaffirmed that the required skills, knowledge and abilities required for a position were related specifically to the demands of the job and the qualification statements were written so as not to arbitrarily screen out applicants with disabilities. When physical requirements are included, they were reviewed by Compensation or Employment consultants. However, they were less aware whether internal job postings included information pertaining to reasonable accommodation for applicants, or whether postings and notices are made available in alternative formats when requested. They were uncertain whether job postings are displayed in accessible locations. In addition, they had mixed perceptions whether testing and interviews are given in accessible locations and accommodations are provided during the interview process when requested. However, all generally agreed that interview questions are job related and the interviewers know what questions can be asked of applicants with disabilities. In all aspects of employment, whether on the job, staff development, or in the workplace, the respondents indicated that accommodations and access are provided. The only uncertain area cited by respondents were regarding physical access to certain areas used by employees during the course of the work day.

The majority of the interviewees indicated that the staff were aware that the ADA prohibits discrimination against applicants or employees who have a relationship or an association with a person with a disability.

Faculty and Staff Interview: Faculty, Classified Staff, and DSPS Staff Focus Groups

Six classified staff from City College were asked to participate in a focus group to determine ADA compliance and awareness. Of the six invitees, three participated in the focus group meeting and a fourth invitee returned a completed questionnaire. Three DSPS staff members attended the focus group and completed the ADA Self Evaluation questionnaire and one was absent from the meeting but returned a completed questionnaire. Of the nine faculty members invited to participate, three attended the focus group and one was absent but submitted a completed questionnaire.

Because of the small number of participants, the responses from these three groups will be discussed

together in order to strengthen the reliability of the findings. The following discussion briefly summarizes the findings of the focus group interviews and questionnaires, and when appropriate combines the information received from the three groups.

Access to Programs

Staff and faculty members were generally aware of the number of students with disabilities in their particular program, but were unaware of any individuals with disabilities who had not yet identified themselves as having a disability. As might be expected, DSPS Staff members were the most aware of students with disabilities who have identified themselves. Individual DSPS Staff members knew from 200 hundred to more than 700 students who have identified their disability. Staff and faculty members were less aware of other faculty and staff with disabilities who had identified a disability.

Faculty, classified staff, and DSPS staff members indicated that since January 26, 1992 some modifications had been made to buildings and technology at City College, including special tutoring through the DSPS and the Writing or English Center, the availability of longer tutoring hours, installation of new work stations, implementation of DSPS testing services and aids, relocation of rooms for easier access, remodeling of new and existing offices, and acquisition of adaptive computer devices.

Classified staff expressed mixed responses as to the provision of auxiliary aids or accommodations to individuals with disabilities in programs at City College. Their comments reflected the divergence of views on this question and the places on campus with which they were familiar. Two classified staff members indicated that their program did not provide auxiliary aids and accommodations, and that individuals with disabilities were frequently referred to DSPS.

All of the DSPS staff agreed that DSPS provides auxiliary aids or accommodations. In addition to the detailed list of aids and accommodations stated earlier, DSPS staff also indicated that students with disabilities have the following resources and accommodations available to them: computer programs and devices, electronic spellers, priority registration, campus orientation, assessment for learning disabilities, and closed circuit television. Faculty members generally agreed that their program offered auxiliary aids and accommodations such as sign language interpreters, tutors, test accommodations, provide desired seating in class, trackballs, and screen

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magnification software.

Faculty, classified staff, and DSPS staff were also divided on the question of whether they were any policies or practices that needed to be modified in order to include individuals with disabilities in various programs or activities, particularly those held off-campus such as field trips. Staff members suggested that students with disabilities should have special accommodation so that they do not have to stand in long lines, and that some computer work stations should be made readily accessible to individuals who use wheelchairs. One DSPS staff member indicated that with the expected growth of incoming students, additional counselors were needed in the DSPS office to provide assistance to individuals with psychiatric disabilities. Faculty noted that accessible transportation to field trips should be available in order to include individuals with disabilities. In addition, they indicated that the length of classes and amount of materials required for in-class activities (such as books) should be modified to meet students' abilities. Many respondents recommended that training and awareness about disability issues was necessary for all members of the campus community. Respondents also indicated the need for additional support for individuals with disabilities.

Faculty and staff indicated that they were kept informed about ADA provisions through meetings, workshops, and staff development sessions. DSPS staff suggested that City College hire additional DSPS counselors and implement training and seminars conducted by DSPS counselors. Some suggested that ADA requirements should be discussed in weekly staff meetings and these discussions should form the basis for planning for continued ADA implementation. Still, other participants suggested annual workshops for faculty and staff to keep them apprised on new requirements and developments regarding ADA implementation.

Faculty, classified staff, and DSPS staff stated mixed responses as to the availability of a tty in their programs or areas. Four interviewees were aware of a tty at their area, however, four others indicated that their was none in their area, and two other respondents did not know. Many of the interviewees indicated that there were telephone emergency services provided in their work areas and that there was direct tty and modem access provided as an emergency service. However, the majority of the faculty did not know if telephone emergency services were provided by their program. Staff members suggested that tty phones and fax machines were needed in more offices on the campus in the event of an emergency involving individuals with disabilities.

Of the faculty and classified staff interviewed, all participants indicated that they did not know whether

public notices, consent forms, announcements, and other communications were provided in accessible formats. In contrast, DSPS staff agreed that provisions had been made to ensure access to these various formats. The DSPS office has these alternative materials available upon request. However, one DSPS staff commented that students should be informed that this service is available to them.

The ADA Title II Technical Assistance Manual states that a review of how individuals with disabilities are portrayed must be conducted to ensure that the portrayals are positive and not demeaning. Of the respondents, nine of the twelve either stated that no such review had been conducted or they did not know of such a review. They suggested that workshops or seminars be offered that provided guidelines on the proper portrayal of individuals with disabilities in official publications and announcements. They suggested a thorough review be undertaken to review all published college materials. One participant suggested that a training videotape be obtained and circulated to campus personnel.

There was uncertainty expressed by several of the respondents in the area of accessibility for all college events, including those held off campus. Five participants stated that not all events are accessible, two were not sure, and four stated that all were accessible. One classified staff member suggested that automated doors were needed. One DSPS staff noted entrance to her office in building A is accessible only via a flight of stairs or an elevator. She recommends that a ramp to the second floor be constructed as an emergency exit.

Overall, faculty, classified staff, and DSPS staff stated that events are programmatically accessible to people with disabilities. This refers to the provision of interpreters for the deaf, captioned videos, assistive listening devices, and large print or Braille handouts. One DSPS staff remarked that faculty and staff need to be trained how to use the closed captioned videos and how to program the televisions. Another respondent suggested that advertisements needed to be added to all announcements for college events describing the accessibility of the event for individuals with disabilities.

Although some students with disabilities are unable to carry what is usually considered a full-time course load, many of the participants acknowledged in their comments that some programs are only offered to full-time students.

The ADA requires that emergency evacuation procedures for individuals with disabilities be reviewed so that access to evacuation in the event of an emergency is assured. Many of the respondents were unaware of

specific emergency evacuation procedures. A DSPS staff member noted that a second exit was needed at the DSPS office for emergencies. Several respondents expressed the need for the development and practice of emergency evacuation procedures.

Four respondents appeared to be aware of the existence of a complaint process and how to file an unlawful discrimination complaint against the District. Seven participants stated that they did not know such a process existed. It was suggested that the procedure for filing complaints against the District be published in campus bulletins, class schedules and the catalog. The participation of individuals with disabilities on planning or advisory boards was discussed. Five of the respondents believed that there were planning or campus advisory boards on which individuals with disabilities served. Six did not know if individuals with disabilities served on such boards or indicated that there were no such boards on which individuals with disabilities could participate. Several respondents welcomed the participation of individuals with disabilities on planning or advisory bodies.

In the college ADA Transition Plan, campuses identified structural barriers to physical access for individuals with disabilities. As part of this plan, the major architectural barriers have been identified, although smaller obstacles may exist such as furniture or equipment in inaccessible arrangements. Participants were asked to identify smaller architectural features and non-structural measures that potentially limit access. Participants cited the need for door stops, door bells, easels, tables (instead of desks for individuals who use wheelchairs), rearrangement of furniture to accommodate wheelchairs, appropriate signs (e.g. Reserve front tables for tutoring of DSPS students). One faculty member suggested that the digital computer lab be moved to a larger room to increase accessibility to individuals with disabilities.

Program Eligibility

All of the faculty and classified staff stated that there were no limits to the proportion of individuals with disabilities able to participate or enroll in college programs. However, DSPS staff noted that, in certain programs, they were limited to the number of DSPS students they could serve because of scarcity of equipment, personnel, and resources to serve the growing DSPS student population. Due to the large number of DSPS students, there are waiting lists for some DSPS services. One DSPS staff member express the need to hire additional DSPS counselors. All the respondents agreed that the admissions office was accessible to individuals who use wheelchairs and other

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mobility devices.

All staff members agreed that, following admission to programs, inquiries about an applicant's disability were only collected on a voluntary basis, and that such information was kept confidential. Although many of the faculty respondents either disagreed or did not know if this information was obtained on a voluntary basis, both faculty and staff respondents generally agreed that such information is kept confidential.

Classroom and Curriculum

Only faculty and DSPS staff members were asked about classroom and curriculum. Five participants agreed that when necessary, classes are reassigned or relocated to accessible locations to accommodate students; three participants either disagreed or did not know. None of the faculty respondents were aware of departmental or college time limits for the completion of degree requirements that could not be modified for students with disabilities; all of the DSPS staff respondents indicated that they did not know whether degree requirements could be modified. Two the faculty said that certain programs, activities, courses, or degree requirements exclude students with total or partial loss of vision, however, the rest of the faculty agreed that a disability did not exclude students from participation in programs. Two DSPS staff members indicated that students with chronic health conditions are excluded for certain programs at City College. All other DSPS staff agreed that a disability did not exclude anyone from participation. When students with certain disabilities have to be excluded, it was normally due to health and safety requirements, or state and federal licensing requirements. The majority of the faculty and DSPS staff indicated that students with visual or learning disabilities were provided with tape recorders in lieu of standard note taking. However, they are less clear whether Braille note taking devices are available for students; half of the respondents agreed that these devices were available and half did not know. All respondents agreed that note takers and sign language interpreters are available for students who need them and permitted in all classes or meetings. All also agreed that guide dogs are permitted in all campus locations or meetings. Similarly, all respondents indicated that special testing accommodations were available for students with disabilities.

Faculty members were asked whether specific courses required for the completion of degree requirements (with the exception of courses essential to instruction directly related to licensing requirements) could be substituted to accommodate students with disabilities. Three responded that they did not know and one stated that substitutions

could be made.

Faculty members were also asked whether their program offered internship or field placement opportunities similar to those available to students without disabilities. Half of the respondents stated that their respective programs offer internship or job placements that include accommodations for individuals with disabilities. The other half indicated that these opportunities were not offered in their programs.

Faculty and DSPS staff were also asked about the process of registering for courses in their respective programs. The respondents noted that phone registration has modifications available to students with disabilities. Additionally, tty and support personnel are available at the admissions office to assist students with the registration process.

In general, faculty members indicated that library and learning resource materials are available to all students with disabilities such as videotapes, extended book checkout, and supplemental reading materials.

Computers and Information Technology

In general, faculty, classified staff, and DSPS staff felt that adequate and reasonable accommodations had been made for access to computers and information technology by faculty and staff members with disabilities. They also emphasized ergonomic improvements to prevent injuries. Sticky keys, trackballs, alternative keyboard and keypad labels, large monitors, screen magnification software, speech synthesizers, magnifying closed caption television, video tapes, Braille printers, screen flasher, large print and ASCII formatted documentation, and screen magnification devices are available to faculty and staff. When DSPS staff were asked whether equipment training was provided for instructional assistants or aides who assist students, faculty, and staff with disabilities, one participant responded affirmatively and one did not know.

While some computing stations were seen as inaccessible for individuals with disabilities, most of the respondents indicated that alternative accessible areas are available. The majority of the faculty and staff indicated that adaptive technology was available during the same time and offered the same computing capabilities as the non-adaptive computers.

Employment

Staff interviewed were equally divided on whether training or written material on Title 1 of the ADA (employment related regulations) had been provided to staff involved in any employment related activities such as preparing job descriptions, advertising, interviewing, testing, hiring, training, and supervising. However, all faculty interviewees stated that City College provided them with training and materials on Title I of the ADA. Nonetheless, all respondents agreed that a training session on the ADA was needed. Interviewees had mixed responses to the question pertaining to internal departmental application forms and notices, and whether reasonable accommodations to these forms are provided when requested by individuals with disabilities. In addition, most were not certain if reasonable accommodations are provided during the application process when requested by individuals with disabilities. A majority felt that job descriptions were current and up-to-date and that duty statements detailed the essential functions of the job. Most also agreed that the required skills, knowledge, and abilities directly related to specific job duties were included on the job descriptions, however, two respondents did not know. All the respondents, faculty and staff members, indicated that qualification statements were not written in such a way that they could improperly screen out applicants with disabilities. Most did not know if physical requirements of jobs had been reviewed by Compensation and Employment staff. Whereas the majority of the faculty and classified staff believed that job postings were accessible to individuals with disabilities either through convenient locations, alternate formats, and through other medium, the DSPS staff were uncertain whether accommodations were implemented. With regards to the question on the validation of employment related tests, all but one participant indicated that they did not know whether employment tests were given to all applicants and not just to those with disabilities. Most of the staff were not certain if reasonable accommodations were provided during the testing process when requested by individuals with disabilities, but most of the faculty were aware of these accommodations. In contrast, a majority of the interviewees agreed that employment interviews were conducted in physically accessible locations and that reasonable accommodations were provided. Some agreed, but most did not know, that all interview questions were job-related, and that interviewers were aware of both proper and improper questions of individuals with disabilities during the interview process. The participants were equally divided on the question regarding reasonable accommodation in all phases of employment; most were unaware or did not know. In addition, eight participants agreed and two did not know that reasonable accommodations are provided when

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requested to enable employees with disabilities to participate in training or professional development activities. Most respondents agreed that the areas used by employees including work areas, rest rooms and lounges, and lunchrooms were physically accessible. Six of the eleven respondents indicated that in general college staff were aware that the ADA prohibits discrimination against applicants or employees who have a relationship or an association with a person with a disability.

Summary

There were divergent views expressed on the status of compliance and implementation of the ADA at City college. In addition, there were obvious differences in level and amount of knowledge concerning programmatic access among the eight groups. Overall, students, administrators, faculty, and staff, interviewed felt that most provisions on accessibility of programs, technology, employment, and campus areas had been or will be accomplished. However, some disagreed, citing specific areas where access needed to be improved. An area consistently cited was campus computer labs which made it difficult for individuals with disabilities to navigate easily. Most tended to agree that walk ways and ramps throughout campus required maintenance and repairs. There also appears to be varied interpretation on what constitutes access and reasonable accommodation. Whereas some feel that access is provided through allocating workstations or designating doors for individuals with disabilities to use or providing alternative formats or technologies upon request, others feel that such accommodations and alternative formats must be provided at all times regardless of whether a request is made. There was a general consensus that a thorough campus review must be conducted to identify non-structural barriers to access from admissions to employment. In addition, training was advocated so that accommodation and access for individuals with disabilities could be improved. One area that participants were not aware of was emergency evacuations. Throughout this report, interviewees reiterated the need for publications, seminars, and training to increase the awareness among members of the entire City College community of policies and practices that extend availability to individuals with disabilities.